

1 **Q. Please state your name and business address.**

2 A. My name is Craig P. Johnson. My business address is 201 South Main, Suite 2300,
3 Salt Lake City, Utah.

4 **Q. Briefly describe your educational background, professional training and**
5 **experience.**

6 A. I graduated from Brigham Young University in 1981 with a Bachelor of Science
7 Degree in Accounting. After working at General Telephone, I joined PacifiCorp in
8 1984. My assignments at the Company have included working in the Regulation,
9 Financial Planning, and Financial Analysis departments. At present I am a
10 Regulatory Consultant. My primary responsibilities include preparing rate cases and
11 analyzing regulatory issues facing the utility.

12 **Q. What is the purpose of your testimony?**

13 A. My testimony explains the revenue requirement impact of the sale of water rights and
14 related assets of the Naches and Naches Drop hydroelectric generating stations (the
15 “Naches Project” or “Project”) and describes the anticipated benefits to customers
16 from the sale of the Naches Project.

17 **Q. What is the current and future cost of generating power from the Naches**
18 **Project?**

19 A. During 2001, the average cost of energy generated was approximately \$46 per
20 megawatt hour (“MWh”), according to a Company busbar report. Looking forward,
21 the base case assumptions explained in the testimony of Mr. Landolt indicate the
22 future 30-year levelized cost of energy will increase to approximately \$65 per MWh.

1 Lower energy production volume combined with increasing costs are expected to
2 sharply increase the future unit cost of power from the Naches Project.

3 **Q. Are there benefits to PacifiCorp customers if the assets are retained?**

4 A. Based on the Company analysis, the answer is no. Although the Naches Project
5 generated benefits for customers for many years, today it appears that those benefits
6 are diminishing. The Naches Project is a run-of-river project. Naches is a small
7 hydro project. It is not equivalent to large projects like those on the Lewis and
8 Umpqua Rivers, which provide valuable peaking power and generate relatively large
9 amounts of energy compared to the fixed cost of operations. It has no storage or
10 reservoir to provide energy at peak periods more than the normal seasonal
11 streamflow. The cost of operating Naches is expected to increase. The future unit
12 cost of generation is not cost competitive. Continued ownership of the Naches
13 Project results in future customers of PacifiCorp paying prices for energy that exceed
14 the market. A sale of Naches is expected to benefit customers by lowering future
15 revenue requirements.

16 **Q. What is the revenue requirement impact of selling the water rights and
17 associated assets of the Naches Project?**

18 Selling the water rights and associated assets of the Naches Project is expected to
19 lower the future revenue requirement \$5.9 million in present value. Retaining the
20 Naches Project is likely to be more expensive than selling the resource and acquiring
21 an equivalent amount of energy at market prices. As Mr. Cunningham and
22 Mr. Landolt explain, the future cost of operating the Naches Project, particularly the
23 exposure of added FERC licensing costs, along with expected lower levels of

1 generation to comply with environmental requirements to improve salmon and
2 steelhead habitat on the Naches River are likely to diminish the economics of
3 generating power from the Naches Project. The base case assumptions of stable
4 operating costs and lower power generation contrasted with future power prices show
5 that selling the water rights and related assets of the Naches Project will lower the
6 present value of the total Company revenue requirement. The present value of the
7 annual revenue requirement was calculated to operate the Naches Project for
8 30 years. This is compared with the present value of the revenue requirement of
9 purchasing energy in the marketplace for the same time period. The present value of
10 purchasing energy is less than operating the generator by \$5.9 million.

11 To test the robustness of the financial analysis, the Company also evaluated
12 the financial outcome of three alternatives to the base case assumptions. A summary
13 of the revenue requirement in present value dollars for the base case and alternative
14 analyses is provided in Exhibit ____ (CPJ-1). Mr. Landolt explains the assumptions
15 underlying the base case. Alternative 1 is based on the same assumptions as the base
16 case, except it has the relatively optimistic assumption that capital expenditures are
17 less than those in the base case. Alternative 2 varies two assumptions from the base
18 case. It assumes FERC licensing costs of \$1 million and about 2% less MWh
19 generation than the base case. Alternative 3 varies three assumptions from the base
20 case. It assumes FERC licensing costs of \$1 million, plus about 2% less MWh
21 generation and lower capital expenditures than in the base case. Based on all of these
22 alternatives, I conclude that if, as expected, future costs increase and energy
23 production decreases, selling the water rights and associated assets of the Naches

1 Project is the preferred option. Only Alternative 1 suggests a slight economic cost to
2 selling the assets. However, when all the alternative assumptions are weighted with
3 an equal probability, it appears that selling the water rights and assets related to the
4 Naches Project benefits customers more than retaining the assets and running the risk
5 of FERC licensing costs and operating restrictions.

6 **Q. What is the revenue requirement benefit in Washington?**

7 A. As shown in Exhibit ____ (CPJ-1), the base case assumptions indicate a total company
8 benefit of approximately \$5.9 million in present value terms. Washington's allocated
9 share of that benefit is approximately \$504,000. In addition to the dollar benefit, the
10 Company expects that the benefits to the fish habitat on the Naches River will be
11 significant as a result of this transaction. This is explained in detail in the testimony
12 of Mr. Esget. The United States Bureau of Reclamation ("Reclamation") plans to
13 increase stream flows in the original river bed are expected to produce environmental
14 benefits not accounted for within the financial analysis presented in this testimony.

15 **Q. Will the sale of assets produce a gain?**

16 A. Based on estimates of the appraised real estate purchase price and other transaction
17 costs, it is estimated that the sale price will produce a slight after-tax gain of
18 approximately \$74,000. Exhibit ____ (CPJ-2) shows the calculation of the estimated
19 gain. These preliminary figures may change depending upon when the sale actually
20 occurs and the appraised value of the real estate involved in the transaction.

21 **Q. Does this conclude your direct testimony?**

22 A. Yes, it does.